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Attorneys for Freedom Mortgage Corporation

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

In Re

Case No.: 21-40945

Mary Tilbury,

Chapter 13

Debtor.

**RESPONSE TO OBJECTION TO CLAIM  
NUMBER 2-1**

**HEARING DATE:**

Date: **tbd**

Time: **tbd**

Place: **tbd**

**TO THE HONORABLE WILLIAM J. LAFFERTY, UNITED STATES BANKRUPTCY  
COURT JUDGE, THE DEBTOR, COUNSEL FOR DEBTOR, AND OTHER INTERESTED  
PARTIES:**

US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner  
Trustee For VRMTG Asset Trust ("Creditor") hereby responds to Debtor's Objection to Claim Number  
2-1 filed on 6/10/2022 as docket entry number 62 (the "Objection").

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**I.**

**RESPONSE**

The Objection seeks to reduce Creditor's pre-petition arrearage [set forth in its proof of claim, claim number 6 ("POC")] from \$47,375.16 to \$0.00. In support, the Debtor sets forth that Creditor received \$75,286.04 from the California Mortgage Relief Program, upon Debtor's application to said program.

Creditor confirms receipt and agrees that the pre-petition arrears are now \$0.00. While Creditor is in the process of filing an amended proof claim to reflect the \$0.00 in pre-petition arrears, Creditor was not able to get the amended claim on file prior to the filing of the Objection. In any event, Creditor agrees with the Objection's assertion that the pre-petition arrears are now \$0.00.

Creditor would respectfully request that any order sustaining the Objection be limited to confirming that the pre-petition arrears are \$0.00 and that it not any include any substantive determination as to the validity or enforceability of the underlying claim itself.

DATED: 7/11/2022

Respectfully Submitted,

McCalla Raymer Leibert Pierce, LLP.

By: /s/ Dane W. Exnowski

DANE W. EXNOWSKI

Attorneys for Creditor